

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHRISTOPHER HUDSON, in his individual
capacity on behalf of himself and others
similarly situated,

Plaintiff,

v.

NATIONAL FOOTBALL LEAGUE
MANAGEMENT COUNCIL, *et al.*,

Defendants.

No. 1:18-cv-4483-RWS

**DECLARATION OF MICHAEL L. JUNK IN SUPPORT OF
THE RETIREMENT BOARD’S MOTION TO DISMISS**

Pursuant to section 1746 of Title 28 of the United States Code, MICHAEL L. JUNK declares as follows:

1. I am of counsel with Groom Law Group, Chartered, and counsel for Defendants, The Retirement Board of the Bert Bell/Pete Rozelle NFL Player Retirement Plan, Katherine Blackburn, Richard Cass, Ted Phillips, Samuel McCullum, Robert Smith, and Jeffrey Van Note (collectively, the “Retirement Board”).

2. I submit this declaration in support of the Retirement Board’s Motion to Dismiss.

3. Attached hereto as Exhibit A is a true and correct copy of the Bert Bell/Pete Rozelle NFL Player Retirement Plan, amended and restated as of April 1, 2009.

4. Attached hereto as Exhibit B is a true and correct copy of the Summary Plan Description for the Bert Bell/Pete Rozelle NFL Player Retirement Plan, dated August 2010.

5. Attached hereto as Exhibit C is a true and correct copy of the Order dated March 23, 2015 issued in the case styled *Bryant v. Bert Bell/Pete Rozelle NFL Player Ret. Plan*, No. 1:12-cv-936, in the United States District Court for the Northern District of Georgia, at Docket Number 45.

6. Attached hereto as Exhibit D is a true and correct copy of a letter from Michael B. Miller to Christopher Hudson dated November 22, 2016.

7. Attached hereto as Exhibit E is a true and correct copy of a letter from Robert Donati to Paul Scott dated March 27, 2015.

8. Attached hereto as Exhibit F is a true and correct copy of Plaintiff's Complaint (ECF 1) dated May 21, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 31, 2018

Respectfully submitted,



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CASS, TED PHILLIPS, SAMUEL
MCCULLUM, ROBERT SMITH, AND
JEFFREY VAN NOTE